
DOE/OR/21548-812
CONTRACT NO. DE-AC05-86OR21548

EXIT PLAN

WELDON SPRING SITE REMEDIAL ACTION PROJECT
WELDON SPRING, MISSOURI

DECEMBER 1999

REV. 1




U.S. Department of Energy
Oak Ridge Operations Office
Weldon Spring Site Remedial Action Project

Prepared by MK-Ferguson Company and Jacobs Engineering Group

Printed in the United States of America. Available from the National Technical Information Service, NTIS, U.S. Department of Commerce, 5285 Port Royal Road, Springfield, Virginia 22161.

NTIS Price Codes - Printed Copy: A02
Microfiche: A01

 MORRISON KNUDSEN CORPORATION MK-FERGUSON GROUP Weldon Spring Site Remedial Action Project Contract No. DE-AC05-86OR21548	
	Rev. No. 1
PLAN TITLE: Exit Plan	

APPROVALS

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Exit Plan

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Prepared by

MK-FERGUSON COMPANY
and
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7295 Highway 94 South
St. Charles, Missouri 63304

for the

U.S. DEPARTMENT OF ENERGY
Oak Ridge Operations Office
Under Contract DE-AC05-86OR21548

ABSTRACT

The Weldon Spring Site Remedial Action Project formally concludes at the end of Fiscal Year 2002. This *Exit Plan* defines the elements and approach that will be used to terminate all contracts and subcontracts in an orderly manner, to conduct phase-out activities in an orderly manner, and to prepare Government assets for disposition.

SUMMARY OF CHANGES

Revision 1 of the *Exit Plan* incorporates the following changes:

- Section 1.1: Remove reference to section on orders and regulations.
- Section 3:
First paragraph: Property that cannot be reasonably decontaminated will be placed in the disposal cell.
- Section 3:
Last paragraph: Unneeded office equipment will either be excessed or donated to Francis Howell High School.
- Section 4:
Second bullet: CMSA garage will be decontaminated as necessary.
Sixth bullet: One 10 ft by 10 ft opening will be left in tunnel barricades for bikers as required by MDC.
Seventh bullet: Change "Water Treatment Plant" to "Sanitary Water Treatment Plant."
Tenth bullet: "Change Francis Howell High School" to "Francis Howell School District."
- Section 5.2: Responsibility for inspection reports will be transitioned to Francis Howell School District.
- Section 5.3, Table:
Row 11: Closure date of meteorological station will be 12/00, when NESHAPS monitoring will be complete.
Row 19: PMC will write letter announcing final FFA quarterly report, and GJ may have responsibility for this report when the project is complete.
- Section 7: PMC will complete the CERCLA closeout report when all four operable units are complete.

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1. INTRODUCTION

1.1 Purpose

The Weldon Spring Site Remedial Action Project (WSSRAP) formally concludes at the end of Fiscal Year 2002. This Weldon Spring Site Remedial Action Project *Exit Plan* defines the project's approach to physical, administrative, and contractual completion of the project to ensure successful closure and transition to the *Stewardship Plan for the Weldon Spring Site* (in press), which will govern activities after the WSSRAP is completed. This document defines the elements and approach that will be used to terminate all contracts and subcontracts in an orderly manner, to conduct phase-out activities in an orderly manner, and to prepare Government assets for disposition.

The *Exit Plan* includes the following sections:

1. Introduction
2. Records
3. Property
4. Facilities
5. Programs
6. Personnel
7. Contracts
8. Record of Decision ARARs and Commitments

It is the policy of the Project Management Contractor (PMC) to conduct closeout activities in close coordination with the U.S. Department of Energy (DOE); in accordance with DOE policies, regulations, and orders; and in compliance with Government laws and regulations. These activities will be conducted in an open manner to assure all parties that actions are both fair and cost effective.

The PMC will continue to follow the internal policies adopted for operations under the prime contract where applicable in the areas of finance, accounting, procurement, personnel, safety, health, environment, engineering, and records.

1.2 Scope

This plan addresses actions for project closure.

1.3 Authorizing Document

The authorizing document for preparation of this plan is the prime project management contract.

2. RECORDS

Records are any recorded information or data that provide evidence of the management, organization, policies, procedures, functions, decisions, and/or technical activities at the Weldon Spring Site Remedial Action Project (WSSRAP). A record is any information that is used to conduct business and that can be retrieved when needed. Non-records include items with little or no retention value. Reading files, copies of documents/correspondence/drawings, personal papers, trade journals, and under normal circumstances, drafts and working papers are considered non-records and may be discarded.

There are six basic steps in the records closeout process for the Weldon Spring Site Remedial Action Project (WSSRAP).

1. PERFORMING RIDS: Perform a current Records Inventory Disposition Schedule (RIDS) to determine what types of records are present and notifying the Records Officer in Oak Ridge of the approximate total volume.

As the WSSRAP has done in the past, the form, DOE F 1324.10, will be used to document RIDS and determine the total cubic feet of records accumulated by the project. This will allow for the following to be identified:

- Description of the filing series.
- Current location of the files.
- Identification of the organization holding the files.
- Arrangement or filing scheme of the files (e.g., alphabetical, by date, by number).
- Existing filing plans, indexes, or other locating aids.
- Restrictions for access and use.
- Media on which the records are maintained. (Hard copy, microform, and machine-readable records are inventoried separately to allow for identifying specific disposition.)

All active and inactive records created, maintained, or used by each WSSRAP department will be identified and listed on DOE F 1324.10 regardless of the physical medium (e.g., paper, electronic, photographic, tape, database, chart, drawing). Records and non-records must be inventoried on separate forms, indicating when non-records will no longer be required. Summary guidelines with examples and lists of the General Record Schedule (GRS) and the DOE Record Schedule for RIDS are

available from the Records Manager. The Record Coordinator for each department will receive a diskette containing a blank DOE F 1324.10 in Word format and instructions for completing the form. When a current RIDS is finalized, the Records Officer of the Oak Ridge Office will be asked to review and approve the scheduling and disposition of all records.

A final complete RIDS will be completed by January 2000.

2. IDENTIFYING RECORDS AND TRANSFER POINTS: Identifying the proper disposition authorities and disposition schedules for the records, determining the location of each type and category of record that will be transferred, and contacting the proper individuals in each final storage location that records are to be transferred with assistance from the Oak Ridge Records Officer.

To ensure proper disposition authorities and schedules are assigned, the DOE Records Schedule for Environmental Response (DOERS-ER) will take precedence. Any records outside the scope of this schedule will be dispositioned under the DOE general Records Schedule (DOERS). The National Archives General Records Schedule (GRS) will be used when files do not fit the DOERS. In some rare cases it may be necessary to list and describe the records on DOE F 1324.5, the request for records disposition authorization form, for records that fall outside the scope of these schedules. These forms can be obtained from the WSSRAP Records Manager. Upon final review and approval by the Oak Ridge Records Officer, and with Oak Ridge assistance, the WSSRAP Records Manager will acquire all information needed to facilitate transfer of records to final storage locations.

3. DETERMINATION OF COMPLIANCE - Ensures that all records requiring duplication have been identified and are copied by microfilming, aperture cards, etc., and determines the media for transfer of electronic databases.

In order to comply with DOE and contract requirements, it will be necessary to duplicate a portion of the WSSRAP records. Following a concerted review of records, a determination will be made to ensure that records are duplicated or in the process of duplication for dual storage. At this time, it will be necessary to determine which media should be used to transfer electronic databases. If it is determined that any or all databases should be in hard copy form, printing of such will commence immediately providing no further changes or additions will be made to these databases or media.

4. FINAL PREPARATION: Prepares the records for storage, i.e., categorizing, indexing, determining series, disposing of nonrecord or duplicate matter, and placing in compliant boxes for transfer to storage.

When a final determination has been made as to the media, series, and disposition of all records, final indexing and categorization must be performed. This must occur before the records are transferred to the final holding sites (e.g., the Federal Record Center, MK-Ferguson Records Warehouse, Jacobs Engineering Home Office, or National Archive Records Administration). All material that is identified as non-record (i.e., duplicates, working copies, reference documents) will be segregated from records. The Morrison Knudsen Company Boise Home Office and Jacobs Engineering Group will be asked to provide record box labeling rules before their records are shipped.

5. FINAL MAINTENANCE - Maintains existing records until final collection of all records, including records at off-site storage locations, is complete. This also includes ensuring that electronic data can be retrieved. Regular appraisals will track the status of records in the closeout plan.

As records are made available during project closure, they will be processed and added to the records awaiting transfer to the appropriate locations. During final labeling and boxing, transfer of records to MK-Ferguson Company and Jacobs Engineering Group will begin in order to reduce the volume of records on site. This will facilitate a thorough and complete closeout of project records.

TRANSFER OF RECORDS - Finalize closeout of records and transfer to respective storage locations as determined by the WSSRAP records inventory schedule, which will be developed with assistance from DOE-Oak Ridge using the general records schedule, the Department of Energy record schedule, and the Department of Energy environmental record schedule.

Table 2-1 lists the different categories of records, the format the records are in, and which organizations - the Federal Records Center, National Archives, Morrison Knudsen, and Jacobs Engineering - will want copies.

Table 2-1 Record Identification List

RECORD CATEGORIES	RESP. DEPT.	REC. DISP.	FORMAT	FRC	NARA	MKF	JEG
Work Packages	ADMIN		HC/RF	X	X	X	
Contract Documents Admin			HC/DB	X	X	X	
ROCA	ADMIN		HC/RF	X	X	X	
Computer Programs							
WORD	MIS		CD	X		X	
CADD	MIS		CD	X	X	X	
DCS	ADMIN		DB	X	X	X	
SQE	MGMT		DB	X		X	
TMAX	COMM REL		DB	X	X	X	
TIPS	MGMT		DB	X		X	
CC-Mail	MIS		DB	X	X	X	
QA/QC Documents	QA		HC/CD	X		X	
Lessons Learned			DB	X	X	X	
QA MASTER			DB	X	X	X	

Table 2-1 Record Identification List (Continued)

Environmental Data		ES&H		HC/CD					
	AIR	ES&H		DB		X		X	X
	FST	ES&H		DB		X		X	X
	WIZARD	ES&H		BD		X		X	X
	WITS	ES&H		DB		X		X	X
	EST			DB		X		X	X
	DATO			DB		X		X	X
Personnel Data									
	ARTS	HR							X
	HRIS	HR		DB		X			X
	MK EVAL	HR		DB		X			X
	DIVREG	HR		DB					X
	TRAINING RECORDS	CR		HC					X
Engineering Records									
	Drawings	ENG		HC/CD		X		X	X
	Tasks	ENG		BO/AC		X		X	X
	GIS	ENG		HC		X		X	X
	SISU	ENG		DB		X			
		ENG		DB		X		X	X
Medical Records									
	Subcontractors	ES&H		HC/RF		X		X	X
	JEG Personnel	ES&H		HC/RF		X		X	X
	MK Personnel	ES&H		HC/RF		X		X	X
	SHARP			DB		X		X	X
	WETS			DB		X		X	X

Table 2-1 Record Identification List (Continued)

Procurement Records	PROC		HC	X		X	
Purchase Orders	PROC		HC/RF	X		X	
Quality Requisitions	PROC		HC/	X		X	
Contractor Insurance Tracking	PROC		DB	X		X	
POINT			DB	X		X	
Photos	CR		CP/N/S	X		X	
Progress Photos	ADMIN		CP/N/S	X		X	
Administration Records	ADMIN		HC	X		X	
MK Personnel	ADMIN		HC			X	
JEG Personnel	JEG		HC			X	X
SMAC-Acct	ADMIN		DB	X		X	
SMAC-Input	ADMIN		DB	X		X	
Journal Vouchers	ADMIN		HC			X	
Contract/Mods	ADMIN		HC	X		X	
Invoice Payments	ADMIN		HC/RF	X		X	
Property Management	ADMIN		HC/CD	X		X	
ABC	ADMIN		DB	X		X	
ALLMAX	CM&O		DB	X	X	X	
ATM	CM&O		DB	X	X	X	
MKES Invoices	ADMIN		HC,			X	
Admin Report	ADMIN		DB	X		X	
Expense Account	ADMIN		DB	X		X	
MK/JEG OT	ADMIN		DB			X	
Phone	ADMIN		DB			X	
POCMPL	ADMIN		DB	X		X	
TDY			DB			X	
Timberline			DB			X	

Table 2-1 Record Identification List (Continued)

Employee Concerns	HR		HC	X		X	
Affirmative Action	HR		HC	X		X	
Substance Abuse Documents	HR		HC	X		X	
Occurrence Reporting DOE 232.1			HC/CD	X	X	X	

3. PROPERTY

As noted in the *Property Management Plan* (Ref. 1), the Project Management Contractor (PMC) will maintain an inventory of U.S. Department of Energy (DOE) property on the site and advise the Contracting Officer of Government property that becomes excess. Property that has been determined to be radiologically contaminated and cannot be reasonably decontaminated for release or accepted for transfer to another controlled site will be placed in the cell or packaged for off-site shipment, and the Departmental Property Custodian will notify the Administration Department who notifies the DOE. The procedure for uncontaminated property is as follows:

1. Department managers identify items as excess to their departments.
2. Department Property Custodians complete the excess property forms and forward them to the Administration Manager.
3. The Administration Department retains the originals of the excess property forms and forwards copies to the Construction Management and Operations (CM&O) Manager.
4. The CM&O Department compiles the forms into excess property lists according to the dispositions requested. The Waste Maintenance Group manages items that are to be excessed.
5. The excess property lists are routed to department managers and project managers who determine if any of the items have further use before they are excessed.
6. The Administration Department completes the SF-120 Forms for items to be excessed and forwards them to the DOE.
7. The WSSRAP DOE office reviews and forwards the SF-120 forms for items it concurs can be excessed to Oak Ridge Operations (ORO).
8. The ORO Property Manager announces within the DOE system the availability of items to be excessed. If no other DOE organization has a need for the items, the SF-120s are returned to the WSSRAP DOE with authorization to excess.
9. The WSSRAP DOE Contracting Officer signs the SF-120 forms approving excessing and notifies the WSSRAP Administration Manager.
10. The Administration Manager forwards the SF-120 forms to the General Services Administration (GSA) which lists the items as excess.
11. The GSA informs the Administration Manager how the items will be dispositioned or in what "lots" the items will be sold. The Administration Manager notifies the

CM&O Manager, who helps potential buyers view the items and remove them from the WSSRAP site.

A final determination of items to be excessed will be completed by October 1, 2001, by the department managers then present on the site. Sufficient office equipment will be kept to support the remaining staff until the end of the project. Unneeded office equipment will be excessed as directed by the DOE or donated to Francis Howell High School when the project is completed.

4. FACILITIES

Management of facilities remaining at the Weldon Spring site when the project is completed is discussed in the *Stewardship Plan for the Weldon Spring Site* (in press). Before the project is complete, the following facilities, which at present are not being addressed by a work package and will still exist, must be dispositioned:

- Administration Building and Composite Building: On April 1, 2002, a walkover of the entire administration building and composite building will be performed, and any necessary repairs will be completed. Beginning on July 1, 2002, project maintenance personnel will begin to meet as necessary with maintenance personnel from the Francis Howell School District to familiarize them with the electrical, HVAC, physical plant, and other systems. (A Work Package to convert the composite building into an interpretation center is being developed.) The laboratory wing of the administration building will be programmed for retention and use by the DOE following project closeout.
- Following any required decontamination, the CMSA garage and associated permanent appurtenances will be retained to be used for groundskeeping equipment.
- Grounds: The DOE will contact the Department of the Army to determine if any of the fence on the common boundaries should be left intact and under the Army's control. Other fences will be removed. In September 2002, final grounds maintenance will be performed as deemed necessary by the grounds crew. This will include the grounds around off-site monitoring wells.
- Cell – By June 1, 2002, an inspection of the cell, the ramp, and the viewing area will be performed, and any necessary repairs will be identified for action prior to October 1, 2002.
- Quarry Haul Road – (WP535) The wires and posts of the double strand fence, WSSRAP-specific signs, and chain link fence leading from the parking lot and across the haul road, including gates and fencing parallel to the haul road will be removed. The chain link fence and bumper posts around the two parking lots, the wooden gates, and the guard rail will remain. The railroad trestle structure will also be removed, but the concrete abutments and foundations will remain.
- Borrow Haul Road – Asphalt and WSSRAP-specific signs will be removed. Tunnels will be barricaded except one 10 ft by 10 ft opening required by the MDC to allow passage of bikers, segments of the road will be covered with gravel after asphalt removal, and remaining ground will be graded to drain and seeded.

- Sanitary Waste Water Treatment Plant – The plant will be transferred to the Duckett Creek Water Treatment District for future operation.
- Train 3 – Operation will be transferred to Grand Junction.
- Monitoring Wells – Keys, locations, and pertinent information will be transferred to Grand Junction during second and third quarters CY02 sampling.
- Utilities – Utilities will be transferred to the Francis Howell School District. The water line to the CMSA will be made permanent.
- Quarry Storage Area – Area where contaminated wastes will be containerized for off-site shipment will be dismantled.

5. PROGRAMS

Programs are defined as activities that are not limited to specific areas, employees, or work packages and which potentially impact the entire Weldon Spring Site Remedial Action Project (WSSRAP). The Project Management Contractor (PMC) intends to eliminate programs as expeditiously as possible and is currently closing many of them. Others will be closed when the project is complete or need no formal closeout. The remainder will be transitioned to Grand Junction prior to October 1, 2002. A formal transmittal will be sent to Grand Junction informing that project of the programs that remain active and that become their responsibility when they take control of the site.

Many of the programs managed by the Environmental Safety and Health (ES&H) and Compliance Departments have end-dates predicated on the PMC retaining responsibility for environmental protection program sampling through the second quarter of calendar year 2002. During the third quarter of that year, the PMC would join and assist DOE-GJ in the sampling, but GJ will be responsible for sample shipment and analysis. GJ will assume all sampling and responsibility for the program in the fourth quarter of calendar year 2002.

Each program has been assigned to a PMC department for management and closure. The following tables list the programs, projected closure dates, and the steps that will be needed to close each.

5.1 Administration Department

In addition to playing a key role in property control, PMC personnel management, contract management, and records closeout, the Administration Department is responsible for the following programs, each of which will have to be maintained until project closure. None of these programs will be transferred to Grand Junction. Any cases outstanding at the end of the project will be handled by MK corporate.

#	Activity	Closure Date	Comments
1	Employee Concerns Management	09/02	Corporate will assign responsibility for any outstanding cases following project closure.
2	Affirmative Action	09/02	Corporate will assign responsibility for any outstanding cases following project closure.
3	Substance Abuse	09/02	PMC demobilization; no formal closeout required

5.2 Construction Management and Operations Department

The CM&O Department will be responsible for providing to Grand Junction the keys to remaining facilities and locks.

The backflow preventor inspection reports, a requirement of the MDNR for water systems, will be transitioned to the Francis Howell School District as facility assignee. These

inspections and reports must be continued as long as the laboratory or any of the sprinkler systems remain active.

The Conduct of Operations program will cease to apply after the last major operating system, the quarry water treatment plant, shuts down. Therefore, it needs no formal closeout.

#	Activity	Closure Date	Comments
1	Security keys	09/02	Transition to Grand Junction
2	CONOPS	04/02	Needed for QWTP operation; no formal closeout required
3	Backflow preventor Inspection reports	09/02	Transition to Grand Junction
4	Lockout/Tagout	09/02	Transition to Francis Howell School District

5.3 ES&H Department

The ES&H Department will be responsible for worker and environmental protection through project closure.

Most worker protection programs will be closed either when construction is complete or at project closeout. The only exception will be the hazard communication program. Although use will diminish, chemicals will remain on site (e.g., cleaning supplies, gasoline) through project transition, so the HAZCOM Program will continue and training will continue to be included in General Employee Training (GET) until the project is complete. When the project is complete, chemical inventories, the MSDS master file, and authorization and container labels will be transferred to Grand Junction.

Plans for the environmental monitoring program are based on the assumption that Grand Junction will accompany the PMC and there will be an overlap in the second and third quarter CY02 sampling. For the second quarter sampling, the PMC will be responsible for sampling, transportation, and analysis of the samples. For the third quarter, Grand Junction will be responsible with the PMC assisting. This will allow the PMC to perform closeout of off-site laboratories and complete final data verification/validation. The final annual site environmental report (ASER) for the project will be for CY01 and will be completed in August 2002. Data from the first half of CY02 will be transmitted to Grand Junction, which will be responsible for the 2002 ASER.

With the removal of the water treatment plant facilities, the chemical plant and quarry NPDES permits will be closed with MDNR's approval. With the closure of the cell and completion of remediation, the project can request that the storm water outfalls be deleted from the permit. The wastewater treatment plant would be the only remaining outfall, and its operation will be transferred to the responsible party, presumably the Duckett Creek Sewer System. At this time it is unclear what the status of Train 3 will be, but if there is an NPDES outfall, the permit will be transferred to Grand Junction.

All air monitoring activities are expected to be complete before project closeout.

#	Activity	Closure Date	Comments
1	Hazard communication	09/02	Assume transfer to Grand Junction; assume a transition period
2	HAZMAT storage	1995	Complete
3	Data verification and validation	09/02	PMC Demobilization; no formal notification needed
4	Environmental protection	04/02	Assume transition of sampling to Grand Junction in 3Q02; EP sampling will be completed by PMC 2Q02; 3Q02 sampling will be performed by GJ with PMC assistance & samples will be GJ responsibility.
5	IH monitoring	09/02	Transition to Grand Junction; should be programmatic by end of project and require mainly record keeping
6	Radiation monitoring	08/02	QWTP demolition complete
7	Emergency response	09/02	Program will be ramped down as activities are concluded. Assume transfer to Grand Junction
8	Off-site analytical lab	09/02	Will terminate contracts following 2 nd Quarter 2002 sampling
9	On-Site Analytical Lab	09/00	End of confirmation sampling
10	Fire protection	09/02	Transition to GJ
11	Meteorological station	12/00	At completion of NESHAPS monitoring
12	Occupational medicine	09/02	Scope will be reduced as activities are concluded. Final physicals will be performed 06/02. PMC demobilization; no formal notification needed
13	Emergency readiness assurance report	12/01	Discontinued when all material is in cell; no formal notification needed
14	ALARA	08/02	QWTP demolition complete
15	SWTP operating permit (MO-storm water)-G670203)	09/02	Transition to Duckett Creek
16	Quarry operating permit (MO-0108987)	08/02	QWTP demolition complete
17	Land disturbance permit (MO-R100B69)	12/01	Borrow Area haul road demolition complete
18	Leachate collection construction permit (22-5186)	07/00	Submit engineering certification to MDNR
19	Wildlife collector's permit		Discontinued pending 07/99 letter
20	Annual site environmental report	08/02	PMC will complete CY 01; will transmit half of the data to Grand Junction for completion of the 2002 report. Grand Junction subsequent years
21	Quarterly environmental data summary report	10/99	Complete based on 06/99 letter
22	Effluent & off-site discharge information system		Waiting for response from ORO/HQ releasing site from requirements

#	Activity	Closure Date	Comments
23	RAD NESHAPS annual report	04/01	Requesting release when first layer clean cover is placed
24	Annual radiation exposure information report	08/02	QWTP demolition complete

5.4 Community Relations Department

The Community Relations Department expects to close both of the remaining programs under its management before the project ends.

#	Activity	Closure Date	Comments
1	PIE	10/01	Transmit letter to DOE 07/01 on intent to close
2	Training program	03/02	Transmit letter to DOE 01/02 on intent to close

5.5 Engineering Department

Although no Value Engineering sessions are currently planned, the program will be retained in case it is needed in the future. No formal closeout will be required. The dam safety program will be discontinued, and the DOE will be notified when the last impoundments, the water treatment ponds at the quarry, are closed.

#	Activity	Closure Date	Comments
1	Value Engineering	09/02	No formal action required
2	Dam Safety	08/02	Will submit letter to DOE notifying program closed
3	As-Built Drawings	09/02	Transmit to MDC, FH School District, DOE-GJ as appropriate

5.6 Compliance Department

As the project winds down, wastes are placed in the cell, and fewer wastes are generated, Compliance Department activities will also wind down. The two activities that will have the most impact on this department at the end of the project will be quarry water treatment plant operations and support of environmental monitoring. Many reporting requirements will be dependent on the amount of chemicals used and wastes generated at the water treatment plant during operations at the interceptor trench. Minimizing chemical purchases and waste generation will minimize or eliminate EPCRA and *Resource Conservation Recovery Act (RCRA)* reporting requirements. The Transportation Management System will be eliminated in July 2002 assuming that DOE-GJ has taken over responsibility for sample management beginning in the third quarter of calendar year 2002.

The Compliance Department is also responsible for maintaining the project's DOE Orders database. Subject matter experts identified through the STRIDES database are asked to review the pertinent Orders to determine their applicability and, for those that are applicable, the

estimated end date for applicability as determined by project activities. Upon the WSSRAP DOE's concurrence, the end date is then established and entered into the STRIDES database to be tracked until the project is closed out.

#	Activity	Closure Date	Comments
1	Waste minimization	07/02	Unless pushed out by some as yet unidentified field activity and assuming a 2 month procurement period, orders for purchase of materials resulting in solid waste will not be allowed after 07/01/02.
2	Transportation management	07/02	Unless pushed out by some as yet unidentified field activity, will be tied to EMP sampling transition to Grand Junction.
3	Hazardous waste inspections		Tied to facilities transfer; will continue until no waste is stored on site. No formal notification required.
4	Annual sampling of SWTP & QWTP	04/02	QWTP complete; SWTP demolition.
5	Waste management plan update	09/01	Transmittal of plan should note it is final.
6	Report unplanned releases	09/02	Expires at project end; no formal notification.
7	HAZMAT certification of registration	06/02	Will renew if hazardous material remain on site that will be transported; otherwise, no formal notification required.
8	Biennial hazardous waste report	03/02	If hazardous waste remains on site during CY02, information will be forwarded to GJ for preparation of report in 2004.
9	PCB annual report	07/01	Not needed year following disposal of last PCB materials.
10	Quarterly compliance report	07/21/99	Closed per discussion with T. Pauling and S. McCracken.
11	Generator's hazardous waste manifest report	08/02	No transport of hazardous waste after this date unless information forwarded to GJ for preparation of manifest report.
12	EPCRA Tier II		Dependent on chemicals used in WTPs. If exceed RQ, will need to transition to Grand Junction, otherwise final report due in March of year following last exceedence.
13	EPCRA Tier II interim notifications		Dependent on chemicals used in WTPs; reporting required whenever the threshold is exceeded through closure.
14	Annual sewage sludge report	12/00	Transition to owners/operators of facility.
15	Federal archeological activities questionnaire	02/02	Report for 2001; subsequent reports will be completed by Grand Junction as necessary.
16	Waste quantities report	1999	Requirement has been deleted.
17	Toxic release inventory report	07/02	Assume site will stay below threshold quantities.
18	Site treatment plan	10/98	Complete.

#	Activity	Closure Date	Comments
19	FFA quarterly status report	07/02	Final report will be for the 3Q02; transmittal letter will note that this is final report by PMC. GJ may be responsible for continuing the report after the project is complete.
20	Commitment, permit, reports tracking	09/02	No formal closeout; reported in quarterly status report; tied to #52.

5.7 Safety

All Safety programs will continue until the end of the project, although they will become more limited in scope as field activities decline. The incentive and VPP programs are assumed to continue until the end of the project pending DOE direction.

#	Activity	Closure Date	Comments
1	OSHA	09/02	PMC demobilization; no formal closeout required.
2	Construction safety	09/02	Support facility restoration construction complete; no formal closeout required.
3	Confined space entry	09/02	Support facility restoration construction complete; no formal closeout required.
4	Facility safety management	09/02	Support facility restoration construction complete.
5	Safety awareness incentive	09/02	Support facility restoration construction complete.
6	VPP	09/02	PMC demobilization.
7	Safety incentive	09/02	Support facility restoration construction complete.

5.8 Planning Analysis and Controls Department

All project control functions will continue until the end of the project and end with a final report to the DOE. Notification of intent to terminate each of these programs will be forwarded to the DOE in June 2002.

#	Activity	Closure Date	Comments
1	Performance management reports	09/02	Transmit letter to DOE 06/02 notifying intent to terminate.
2	Project schedule and milestone updates	09/02	Transmit letter to DOE 06/02 notifying intent to terminate.
3	Funding reports	09/02	Transmit letter to DOE 06/02 notifying intent to terminate.
4	Monthly contractor report	09/02	Transmit letter to DOE 06/02 notifying intent to terminate.

5.9 Project Quality Department

The functions of the Project Quality Department will continue until the end of the project, but at a much smaller scope as field activities are completed. Besides transmittals of departmental records and input into the *Record of Completed Actions* (ROCA), no formal closeout will be required.

#	Activity	Closure Date	Comments
1	Lessons learned	09/02	No formal closure required.
2	Site wide audit tracking system	09/02	No formal closure required.
3	Performance indicators	09/02	No formal closure required.
4	Quarterly project quality status report	06/02	Report for 3Q02 will be the last; transmittal letter will notify intent to terminate.

5.10 Miscellaneous Programs

#	Activity	Closure Date	Comments
1	Employee recognition	12/01	No formal closeout required.
2	Suggestion program	12/01	No formal closeout required.
3	TQM	12/01	No formal closeout required.
4	TIPS	12/01	No formal closeout required.
5	Dispute resolution		Management.
6	Quarry haul road easement	08/02	When Construction Complete-Quarry (WP-529).
7	Hamburg Trail interpretive center	08/02	When Construction Complete-Quarry (WP-529).
8	Borrow area easement	12/01	
9	Floodplain development permit	08/02	When Construction Complete-Quarry (WP-529).
10	SWTP effluent pipeline KATY Trail easement		

6. PERSONNEL

Using the completion-of-assignment flowchart transmitted to the U.S. Department of Energy (DOE) on December 12, 1997 (DIN 74522), decisions as to which employees to retain will be based on job analyses of the remaining needs and the knowledge, skills, and abilities of the remaining employees. From the annual staffing plan, final staff decisions will be made 6 months prior to a reduction-in-force. Dates will be disclosed to the individual employees approximately 4 months before their completion-of-assignment dates, and the PMC will make efforts to aid the affected employees in finding other opportunities through out-placement services.

Based on the current scope of work, PMC full time equivalent staffing levels will be:

Date	PMC FTEs
10/01/99	171
10/01/00	130
10/01/01	65
07/01/02	55
08/01/02	45
09/01/02	30
10/01/02	0

For eligible employees, the program to provide moving expenses will continue for 90 days following project completion.

7. CONTRACTS

The prime contract will be closed out under *Guidance for Cost Reimbursable Contracts* provided by the U.S. Department of Energy-Oak Ridge (DOE-OR) Procurement and Contracts Division. Early in the closeout process, the WSSRAP DOE office will submit to the Project Management Contractor (PMC) a closeout letter (CostCont.2) requesting relevant closeout information (i.e., general assignment letter, final release form, summary settlement statement). These closeout activities and reconciling actual costs to the contract value will be conducted prior to contract closeout to the extent practical.

The records in Section 2 of this plan, which have been provided during the course of business throughout the contract, will serve as the documentation that the physical requirements (i.e. construction of the disposal cell, remediation of the chemical plant and quarry areas) have been completed. The *Record of Completed Actions* (ROCA) will provide the final documentation that the contract has been completed and will constitute the final report and deliverable. The PMC will complete this report by July 1, 2002, allowing the DOE 60 days to review and 30 days for revision and finalization. The following table lists all records specifically required by the contract and the date when they have been completed. In addition, the PMC will complete the closeout report as required by CERCLA after all four operating units have been completed.

Report	Contract Citation	Report # (DOE/OR/21548-)	Date
PMC Transition/Relocation Plan	3.2.1.1	No DOE #; ZZ-10	08/86
Project Management Plan	3.2.1.3	-048	12/93
Environmental Safety and Health Plan	3.2.1.5	-172	02/92
Community Relations Plan	3.2.1.6	-009	02/94
Site Surveillance and Maintenance Plan	3.2.1.7	No DOE #; ZZ-19	01/87
Permit Plan	3.2.1.8	-449	05/99
Site Security Plan	3.2.1.10	-199	02/99
Quality Assurance Plan	3.2.1.11	-352/333	07/99(10/98)
Procurement Department Plan	3.2.1.12	-368	09/99
Site Release Plan	3.2.1.13	-	Not Complete
Data Base and Records Management Plan	3.2.1.14	-495	
Cost, Schedule, and Control Systems Plan	3.2.1.15	No DOE #; ZZ-534	02/94
Configuration Management Plan	3.2.1.16	-212	09/95
Emergency Preparedness Plan	3.2.1.17	-223	03/93
Emergency Response Manual	3.2.1.17	-196	02/93
Bulk Waste RI/FS Work Plan	3.2.2.1	-033	08/88
Bulk Waste Remedial Investigation Report	3.2.2.1	-066	12/89
Bulk Waste Baseline Risk Assessment Report	3.2.2.1	-065	01/90
Bulk Waste Feasibility Study Report	3.2.2.1	-104	02/90
Bulk Waste Record of Decision	3.2.2.1	-317	09/90

Report	Contract Citation	Report # (DOE/OR/21548-)	Date
Bulk Waste Support Studies	3.2.2.1	-126	05/90
Bulk Waste Conceptual Design Report	3.2.2.1	ZZ-014	04/87
Chemical Plant RI/FS Work Plan	3.2.2.2	-033	08/88
Chemical Plant Remedial Investigation Report	3.2.2.2	-074	11/92
Chemical Plant Baseline Risk Assessment Report	3.2.2.2	-065	01/90
Chemical Plant Feasibility Study Report	3.2.2.2	-148	11/92
Chemical Plant Record of Decision	3.2.2.2	-376	09/93
Chemical Plant Support Studies	3.2.2.2	-182	03/91
Chemical Plant Conceptual Design Report	3.2.2.2	-502	03/89
Plan for Action-Army Property 7	3.2.2.3		
Quarry Residuals RI/FS Work Plan	3.2.2.3	-243	01/94
Quarry Residuals Remedial Investigation Report	3.2.2.3	-587	07/97
Quarry Residuals Baseline Risk Assessment Report	3.2.2.3	-594	02/98
Quarry Residuals Feasibility Study Report	3.2.2.3	-595	03/98
Quarry Residuals Record of Decision	3.2.2.3	-725	09/98
Groundwater RI/FS Work Plan	3.2.2.4	EV-145	01/95
Groundwater Remedial Investigation Report	3.2.2.4	-571	07/97
Groundwater Baseline Risk Assessment Report	3.2.2.4	-568	07/97
Groundwater Feasibility Study Report	3.2.2.4	-569	03/98
Groundwater Record of Decision	3.2.2.4		Pending
EE/CA for Southeast Drainage	3.2.2.5	-584	08/98
Project Plan	3.2.13	-310	08/91
Property Management Plan	3.3.5	-096	03/92
Federal Facilities Agreement Implementation Plan	3.3.5	-471	04/99
Management Plan	3.4.1	No DOE #: ZZ-008	
WBS Dictionary	3.4.1.1.1	-179	02/95
Occupational Medical Program Plan	3.4.4.1	-448	09/96
Final Radiological and Toxic/Hazardous Materials Report	3.4.4.4		Not yet completed
Record of Completed Actions	6.2.9		Not yet completed

Disposition of all Government-owned property and records will be done prior to closing out the contract as detailed in other sections of this plan. All outstanding contract issues or on-going audits following completion of on-site activities will be performed by MK Home Office personnel.

8. RECORD OF DECISION ARARs AND COMMITMENTS

The following table lists the regulatory requirements and commitments made in the *Record of Decision for Remedial Action of the Chemical Plant Area* (DOE/OR/21548-376) at the Weldon Spring Site. New tables will be added for the Quarry Residuals and Groundwater Records of Decision as they are prepared.

Table 8-1 Chemical Plant ROD ARARs/Commitments

	PAGE	COMMITMENT	CLOSEOUT DATE	COMMENTS
1	48	Because waste would remain on site under this alternative (in the disposal facility), the U.S. Department of Energy (DOE) would review the effectiveness of the remedy at least every five years following the mitigation of the remedial action in accordance with the provisions of Section 121(c) of CERCLA, as amended.		Must continue until the site is removed from the NPL
2	48	Groundwater, surface water, and air would be monitored at the site and at specific off-site areas throughout the cleanup and maintenance period to facilitate protection of the general public and the environment.		
3	54	Subpart Q sets forth the standard for radon emissions. The standard states that no source at a DOE facility shall emit more than 20 pCi/m(3)s of Rn-222 into the air as an average for the entire source. This standard is applicable at completion of the final remedial action as the Weldon Spring site is a DOE facility.		
4	55	Regulation 40 CFR 61 Subpart T is considered relevant and appropriate to final site conditions because the site contains material sufficiently similar to uranium mill tailings. Subpart T states that Rn-222 emissions to ambient air from uranium mill tailings piles which are not longer operation should not exceed 20 pCi/m(3)s.		
5	56	The Missouri Department of Health has issued standards for Protection Against Ionizing Radiation in 19 CSR 20, which include a Rn-222 concentration limit of 12 pCi/l above background (quarterly average) in uncontrolled areas. This requirement is applicable to protection of the public during remedial action activities. The remaining requirements are similar to those identified in the DOE Orders for radiation protection of individuals and the environment, and the remedial action will also comply with the applicable provisions of those Orders.		
6	57	The remedial action will be conducted in accordance with DOE Order 5400.5, Chapter II, "Requirements for Radiation Protection of the Public and the Environment" and Chapter III, "Derived Concentration Guides for Air and Water". The remedial action will also follow DOE Order 5480.11.		Closeout date will be determined during orders review

	PAGE	COMMITMENT	CLOSEOUT DATE	COMMENTS
7	71	The State of Missouri has requested that the DOE agree to certain stipulations as a condition for obtaining State occurrence. These stipulations are:		
8		1. The U.S. Department of Energy (DOE) shall retain ownership and control of the disposal facility.		
9		2. The DOE shall commit to long-term monitoring and maintenance of the disposal facility.		
10	9.1	The disposal facility will be maintained and its performance will be monitored for the long term.		
11	87	Following completion of site cleanup activities, an assessment of the residual risks based on actual site conditions, including measured concentrations of site contaminants, will be performed to determine the need for any future land use restrictions. This assessment will consider the presence of the on-site disposal cell, the buffer zone, the adjacent Army site, and any other relevant factors necessary to ensure that appropriate measure are taken to protect human health and the environment for the long term. The remedy selected in this ROD will be re-examined at least every five years to ensure that it is protective.		
12	94	UMTRA 40 CFR 192.32(b)(1)(ii) addresses releases of radon from disposal areas after the closure period. These standards will be applicable after the bulk wastes have been placed in the disposal facility and the cover has been completed. At that time, the disposal area will meet the Rn-222 flux standards specified in 40 CFR 192.32(b)(1)(ii). These standards require reasonable assurance that Rn-222 releases will not exceed an average release rate of 20 pCi/m(2) sec.		

	PAGE	COMMITMENT	CLOSEOUT DATE	COMMENTS
13	107	Requirements for post-closure monitoring and maintenance area specified in the RCRA and the UMTRA. The TSCA does not define specific post-closure requirements for a chemical waste landfill. Requirements under the RCRA specify a 30-year post-closure care period for maintenance of the cover, the leachate collection system, and the groundwater monitoring system. Groundwater monitoring requirements are set forth in the RCRA and the Missouri Code of State Regulations. The RCRA groundwater protection standard (40 CFR 264 Subpart F) sets forth general monitoring requirements. A groundwater monitoring program should provide representative samples of background water quality, as well as the quality of the groundwater passing the point of compliance. The sampling should allow for the detection of contaminant migration into the uppermost aquifer. State regulation 10 CSR 25-7.264(2)(f) sets forth surface water monitoring requirements to detect impacts from groundwater contamination. A sampling plan should provide representative background surface water quality (upgradient) samples as well as representative downgradient surface water quality samples. The initial values should be established for biological activity, chemical indicator parameters, and hazardous constituents by conducting quarterly sampling for one year. The surface water quality should be determined at least semiannually, and at those times when contaminant migration is greatest from the shallow groundwater to surface water. This monitoring should be conducted through the post-closure care period.	October 1, 2032	
14	108	Post-closure standards under the UMTRA require the control of radiological hazards to (1) be effective for 1,000 years, to the extent reasonably achievable, and, in any case, for at least 200 years; and (2) limit releases of Rn-222 so as not to exceed an average release rate of 20 pCi/m ² s.	Oct 1, 2202	

PAGE	COMMITMENT	CLOSEOUT DATE		COMMENTS
15	These UMTRA standards are relevant and appropriate because they address similar waste materials and a disposal scenario similar to the WSSRAP. The UMTRA requirements also directly reference the RCRA requirements of 40 CFR 264.111 with respect to the closure performance standard for nonradiological hazards. Therefore, 40 CFR 264.111 and 264.310 are also relevant and appropriate. Since the hazardous waste monitoring/maintenance requirements are more stringent than the solid waste requirements, the latter are not considered as ARARs.			
16	The disposal cell proper is expected to cover about 17 ha (42 acres), but the total amount of committed land would be larger (e.g., double the waste containment area) because a buffer zone will be established and the cell. No other area of the Weldon Spring site would sustain a long-term impact or injury as a result of this permanent remedy. Perpetual care will be taken of the committed land because the waste would retain its toxicity for thousands of years. For example, the cover will be visually inspected, groundwater will be monitored, and the effectiveness of the overall system at the Weldon Spring site will be reviewed at least every five years.	Never		

	PAGE	COMMITMENT	CLOSEOUT DATE	COMMENTS
18	RS// (b) A-3	<p>Response. The DOE is committed to performing long-term monitoring and maintenance of the disposal facility and surrounding area. The parameters and the frequency with which monitoring and inspection will occur cannot be precisely defined at this stage of the remedial action process because detailed design activities can only be completed after this Record of Decision (ROD) has been signed. A long-term monitoring and maintenance plan that includes parameters and inspection frequency will be developed for the project after specific design information becomes available. In developing this plan, the DOE will consider the hydrologic and hydrogeologic conditions at the chemical plant area, will incorporate input received from the public, and will consult with EPA Region VII and the State of Missouri. It is expected that monitoring and maintenance inspections will occur at least annually. More frequent inspections (e.g., quarterly) will be conducted in the near term (e.g., over the first several years) to assess the performance of the containment system. Additional details on the monitoring and maintenance program that will be used at the site will be provided in the Mitigation Action Plan, which will be completed during the detailed design phase of this remedial action. The plan will be available in the information repositories for the project.</p>		
19	RS// (e)	<p>Cleanup activities at the Weldon Spring site will be designed and conducted so that no member of the general public will receive a dose of 25 mrem/yr above background level (doses estimated from conservative assumptions are well below this level). The DOE process whereby risks are reduced to levels as low as reasonably achievable (ALARA) will be applied during field activities. This ALARA process was also explicitly incorporated into the development of cleanup criteria for site soil so that future radiation doses are reduced to levels as far below applicable standards as reasonably achievable.</p>		
20		<p>Following site cleanup, the dose level of 25 mrem/yr will be met for all reasonably foreseeable exposures at the site, except possibly for exposures to indoor radon, if someone were to live at certain locations in the future.</p>		

9. REFERENCES

1. MK-Ferguson Company and Jacobs Engineering Group. *Property Management Plan*. Rev. 3. DOE/OR/21548-096. Prepared for the U.S. Department of Energy, Oak Ridge Operations Office. Weldon Spring Site Remedial Action Project. St. Charles, MO. March 1992.